

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL  
COMMITTEE,  
*et al.*,

Plaintiffs,

v.

REPUBLICAN NATIONAL  
COMMITTEE,  
*et al.*,

Defendants.

Civil Action No. 81-3876

JUDGE DICKINSON R.  
DEBEVOISE

FILED OCT 28 AM 10:30

CLERK OF COURT  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY

**MOTION FOR EXPEDITED DISCOVERY**

Intervenors seek, on an expedited basis, a 30(b)(6) deposition of a representative of the Republican National Committee ("RNC") who can explain the RNC's involvement in the creation and use of lists of challenged voters in Ohio and elsewhere. Intervenors just learned that their right to vote in the November 2 election has been challenged by the Republican Party. On Friday, October 22, the Ohio Republican Party challenged 35,000 voters in Ohio, including the Intervenors. They also recently learned that the challenge list may be part of a coordinated "ballot security" effort by the RNC. Such efforts require pre-approval by this Court under the Consent Decrees. With only six days before the election, Intervenors seek the Court's permission to determine if the RNC has assisted or participated in the Ohio efforts and whether these efforts have utilized activities prohibited under the Consent Decrees. This expedited discovery is narrow in scope and limited. Intervenors request only a 30(b)(6) deposition on the following areas:

Requiring the RNC, pursuant to Fed. R. Civ. P. 30(b)(6) to submit to a deposition on the topics of:

(1) its assistance or participation in any ballot security measures that have not been approved by this Court;

(2) the guidance it has given to state parties on unlawful practices under the consent decree; and

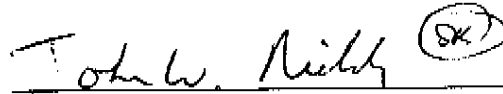
(3) the use by the RNC, its agents, employees and parties acting in concert with the RNC, of direct mail campaigns to persons appearing on voter registration lists; and

(4) the use by the RNC, its agents, employees and parties acting in concert with the RNC of letters returned undelivered to compile voter challenge lists.

Intervenors also request that the RNC produce documents regarding the guidance provided to state parties on practices that are prohibited under the Consent Decrees and any and all documents in the RNC's possession that mention lists of voters in any state whose mail has been returned undelivered.

Upon the taking of such deposition, Intervenors will be in a position to present their motion to enjoin the use of such lists. Intervenors have only just had their right to vote challenge by representatives of the Republican Party.

Respectfully submitted,



John W. Nields, Jr.

Patricia G. Butler

Laura S. Shores

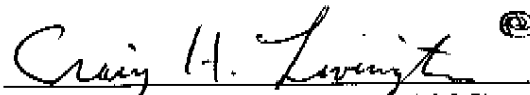
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Dated: October 27, 2004

Counsel for Interveners